

--REMARKS --

The Applicant has thoroughly considered Examiner Nguyen's remarks concerning the patentability of dependent claims 9-23 over *Hunter* in view of *Hochstein* and in further view of *Sakaguchi*. The Applicant has also thoroughly read *Hunter*, *Hochstein* and *Sakaguchi*. To warrant this 35 U.S.C. §103(a) rejection of dependent claims 9-23, all the claim limitations recited in claims 9-23 must be taught or suggested by the combination of *Hunter*, *Hochstein* and *Sakaguchi*. The Applicant respectfully traverses this rejection of dependent claim 9, because neither *Hunter*, *Hochstein* nor *Sakaguchi*, alone or in combination, discloses, teaches or suggests "the drive circuitry regulating the light output of each sub-array independently of the others" as recited in dependent claim 9.

Specifically, in paragraph 5 of the Non-Final Office Action, Examiner Nguyen correctly recognized the failure by *Hunter* and *Hochstein* to disclose, teach or suggest a "the drive circuitry regulating the light output of each sub-array independently of the others" and mistakenly read *Sakaguchi* to disclose "the drive circuitry regulating the light output of each sub-array independently of the others". The Applicant respectfully asserts that a clear understanding of *Sakaguchi* reveals that *Sakaguchi* discloses a sequential dependence in an activation of each color LED in the N/3 backlight section. See, *Sakaguchi* at column 1, line 58 to column 3, line 62. Accordingly, an activation of one set of color LEDs (e.g., red) must precede an activation of a second set of color LEDs (e.g., green), which must precede an activation of the final set of color LEDs (e.g., blue). *Sakaguchi* fails to teach or suggest a timing of the activation of the red LEDs being independent from a timing of the activation of the green LEDs and blue LEDs, a timing of the activation of the green LEDs being independent from a timing of the activation of the red LEDs and blue LEDs, and a timing of the activation of the blue LEDs being independent from a timing of the activation of the red LEDs and green LEDs. In fact, the significance of the sequential dependence in the activation of each color LED in the N/3 backlight section is evidenced by a recitation of the sequential dependency in independent claims 1, 11 and 18 of *Sakaguchi*. See, *Sakaguchi* at column 19, lines 64-67; column 21, lines 15-18; and column 22, lines 24-28.

By comparison, as illustrated in FIG. 4, the present application discloses a controller 232R, a controller 232G, and a controller 232B for regulating the light outputs of a red LED sub-array 230R, a green LED sub-array 230G, and a blue LED sub-array 230B, respectively. Each controller regulates the light output of a corresponding LED sub-array irrespective to a timing of an activation of the other LED sub-arrays or any other parameter involved in the activation of the other LED sub-arrays. This feature of the present application is covered by the limitation of “the drive circuitry regulating the light output of each sub-array independently of the others” as recited in dependent claim 9.

The Applicant has cancelled dependent claim 9 and amended independent claim 1 to recite “a LED drive and control circuit regulating a red light output of said sub-array of red LEDs, a green light output of said sub-arrays of green LEDs, and a blue light output of said sub-arrays of blue LEDs independently of each other.” The Applicant respectfully asserts that amended independent claim 1 is allowable over *Hunter, Hochstein, Sakaguchi* and any combination thereof for the same reason as set forth herein for cancelled dependent claim 9. The Applicant therefore respectfully requests a withdrawal of the rejection of claims 1-5 under 35 U.S.C. §102(a) as being anticipated by *Hunter*, the rejection of claims 6-8 under 35 U.S.C. §103(a) as being unpatentable over *Hunter* in view of *Hochstein*, and the rejection of claims 9-23 under 35 U.S.C. §103(a) as being unpatentable over *Hunter* in view of *Hochstein* and in further view of *Sakaguchi*.

The Applicant has also added independent claim 24, which recites “a first sub-array controller for independently controlling a switching of said first switch between the first ON state and the first OFF state as a function of said first secondary voltage” and “a second sub-array controller for independently controlling a switching of said second switch between the first ON state and the first OFF state as a function of said second secondary voltage”. The Applicant respectfully asserts that independent claim 24 is allowable over *Hunter, Hochstein, Sakaguchi*, the remaining art of record and any combination thereof for the same reason as set forth herein for cancelled dependent claim 9. The Applicant therefore respectfully requests an allowance of independent claim 24.

CONCLUSION

The Applicant respectfully submits that claims 1-8 and 10-23 as amended herein, and claim 24 as added herein fully satisfy the requirements of 35 U.S.C. §§ 102, 103 and 112. In view of the foregoing, favorable consideration and early passage to issue of the present application is respectfully requested.


Dated: **March 3, 2003**

Respectfully submitted,
GERT W. BRUNING, *et al.*

U.S. PHILIPS
580 White Plains Road
Tarrytown, New York 10591
Phone: (914) 333-9634
Fax: (914) 332-0615

Robert J. Kraus
Registration No. 26,358
Attorney for Applicants

CARDINAL LAW GROUP
Suite 2000
1603 Orrington Avenue
Evanston, Illinois 60201
Phone: (847) 905-7111
Fax: (847) 905-7113



Frank C. Nicholas
Registration No. 33,983
Attorney for Applicants